

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS LICENSING & DEVELOPMENT, Plaintiff, v. GOOGLE, LLC, Defendant)))) Case No. 6:20-cv-00572-ADA) Case No. 6:20-cv-00584-ADA) Case No. 6:20-cv-00585-ADA)))) JURY TRIAL DEMANDED))))
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SUPPLEMENTAL JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to the scheduling orders in these cases, the Parties jointly submit this supplemental joint claim construction statement.

I. U.S. PATENT NO. 8,041,806 (CASE NO. 6:20-CV-572-ADA)

Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
“Internet Protocol Television (IPTV) service” (Proposed by Defendant)	Plain and ordinary meaning	“An internet service provider (ISP) service that delivers television content to subscribers over a private, managed Internet Protocol (IP) network connection”

II. U.S. PATENT NO. 8,737,961 (CASE NO. 6:20-CV-585-ADA)

Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
“incrementing of a count for a stationary state associated with the set of one or more distinct signal sources at the current time” (claims 1, 11) (Proposed by Defendant)	Plain and ordinary meaning; not indefinite	Indefinite

Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
“the set of wireless transmitters” (claim 3) (Proposed by Defendant)	Plain and ordinary meaning; not indefinite	Indefinite

III. U.S. PATENT NO. 8,803,697 (CASE NO. 6:20-CV-584-ADA)

Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
“mobile communication device” (Proposed by Defendant)	Plain and ordinary meaning	“a portable device that can communicate while it is moving”

Date: January 13, 2023

Respectfully submitted,

/s/ Joseph M. Abraham

Joseph M. Abraham, TX Bar No. 24088879
Timothy Dewberry, TX Bar No. 24090074
FOLIO LAW GROUP PLLC
13492 Research Blvd., Suite 120, No. 177
Austin, TX 78750
T: 737-234-0201
Email: joseph.abraham@foliolaw.com
timothy.dewberry@foliolaw.com

Cliff Win, Jr., CA Bar No. 270517
FOLIO LAW GROUP PLLC
1200 Westlake Ave. N., Ste. 809
Seattle, WA 98109
Tel: (206) 880-1802
Email: cliff.win@foliolaw.com

Gregory P. Love
State Bar No. 24013060
Mark D. Siegmund
State Bar No. 24117055
STECKLER WAYNE CHERRY & LOVE, PLLC
8416 Old McGregor Road
Waco, TX 76712
Tel.: (254) 651-3690
Fax: (254) 651-3689
greg@swclaw.com
mark@swclaw.com

*Attorneys for Plaintiff WSOU Investments,
LLC d/b/a Brazos Licensing & Development*

/s/ Tharan G. Lanier

Tharan Gregory Lanier (*pro hac vice*)
Jones Day
1755 Embarcadero Road
Palo Alto, California, 94303
+1 (650) 739-3939
+1 (650) 739-3900 facsimile
tglanier@jonesday.com

Michael E. Jones (Texas Bar No. 10929400)
Shaun W. Hassett (Texas Bar No. 24074372)
Potter Minton, P.C.
102 North College, Suite 900
Tyler, Texas, 75702
+1 (903) 597-8311
+1 (903) 593-0846 facsimile
mikejones@potterminton.com
shaunhassett@potterminton.com

Matthew S. Warren (California Bar No.
230565)
Jen Kash (California Bar No. 203679) (*pro
hac vice*)
Erika Warren (California Bar No. 295570)
Warren Lex LLP
2261 Market Street, No. 606
San Francisco, California, 94114
+1 (415) 895-2940
+1 (415) 895-2964 facsimile
20-583@cases.warrenlex.com

Sasha Mayergoyz
Jones Day
77 W. Wacker Drive
Chicago, IL 60601
+1 (312) 782-3939
smayergoyz@jonesday.com

Attorneys for Defendant Google LLC